

1 Isabelle Ord, Cal. Bar No. 198224 (*pro hac vice admitted*)
 2 E-mail: isabelle.ord@us.dlapiper.com
 3 Andrew Serwin, Cal. Bar No. 179493 (*pro hac vice admitted*)
 4 E-mail: andrew.serwin@us.dlapiper.com
 5 Jeffrey DeGroot, WSBA No. 46839 (*pro hac vice admitted*)
 6 E-mail: jeffrey.degroot@us.dlapiper.com
 7 DLA PIPER LLP (US)
 8 555 Mission Street
 9 San Francisco, California 94105-2933
 10 Tel: 415.836.2500
 11 Fax: 415.836.5201

12 Jennifer K. Hostetler, SBN 11994
 13 E-mail: jhostetler@lewisroca.com
 14 LEWIS ROCA RÖTHGERBER CHRISTIE
 15 3993 Howard Hughes Parkway, Suite 600
 16 Las Vegas, Nevada 89169-5996
 17 Tel: 702.474.2624

18 Attorneys for Defendants
 19 FARMERS GROUP, INC., FARMERS INSURANCE EXCHANGE, and
 20 TRUCK INSURANCE EXCHANGE

21
 22 UNITED STATES DISTRICT COURT
 23 DISTRICT OF NEVADA

24 RONALD STALLONE, on behalf of himself
 25 and all other persons similarly situated,

26 Plaintiff,

27 v.

28 FARMERS GROUP, INC., a Nevada
 29 Corporation; FARMERS INSURANCE
 30 EXCHANGE; and 21st CENTURY
 31 INSURANCE COMPANY,

32 Defendants.

33 Case No. 2:21-cv-01659-GMN-VCF

34 **STIPULATION AND ~~PROPOSED~~
 35 ORDER FOR EXTENSION OF CASE
 36 DEADLINES
 37 (FIRST REQUEST)**

38 Plaintiff Ronald Stallone and Defendants Farmers Group, Inc., Farmers Insurance
 39 Exchange, and 21st Century Insurance Company (together, the “Parties”), by and through their
 40 respective counsel of record, hereby respectfully submit this Stipulation and Proposed Order to
 41 Extend Case Deadlines, which seeks an extension of the case deadlines by approximately 180
 42 days. Good cause exists for this extension because despite good-faith and reasonable diligence,

3993 Howard Hughes Parkway, Suite 600
 Las Vegas, NV 89169

LEWIS ROCA

1 the Parties require additional time to complete discovery in this putative nationwide class action.

2 This is the first request for extension of the case deadlines in this matter.

3 **EFFORTS TO COMPLETE DISCOVERY**

4 This is a putative nationwide class action arising from a 2021 security incident in which
 5 unknown cybercriminals targeted insurance company websites across the industry that offer
 6 online automobile insurance quotes. Since the Court's November 14, 2022 Order Granting
 7 Discovery Plan and Scheduling Order, the Parties have diligently engaged in discovery by
 8 exchanging written discovery requests (requests for production and interrogatories), negotiating
 9 appropriate search terms and custodians, and drafting an ESI Stipulation and Stipulated Protective
 10 Order (which the Parties intend to file shortly). Despite these efforts, due to the complexity of the
 11 case and the scope of discovery, the Parties have reasonably concluded that additional time is
 12 required to complete discovery and bring dispositive motions.

13 **GOOD CAUSE EXISTS TO EXTEND THE CASE DEADLINES**

14 Good cause exists to extend case deadlines because, despite the Parties' diligence,
 15 additional time is required to finalize written discovery responses, review and produce
 16 documents, conduct any necessary third-party discovery, complete depositions, conduct expert
 17 discovery, and bring class certification and summary judgment motions.

18 The Parties hereby stipulate and agree to the following proposed deadlines:

Event	Existing Deadline	Proposed New Deadline
Expert disclosures (initial)	October 6, 2023	April 5, 2024
Expert disclosures (rebuttal)	November 17, 2023	May 17, 2024
Discovery cutoff date	December 15, 2023	June 21, 2024
Deadline for filing motion for class certification	February 9, 2024	August 9, 2024
Deadline for filing opposition to motion for class certification	Not set.	September 20, 2024

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Deadline for filing dispositive motions	February 9, 2024	September 20, 2024
Deadline for filing reply in support of motion for class certification	Not set.	October 18, 2024
Pretrial order	March 8, 2024	November 15, 2024

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

IT IS SO AGREED AND STIPULATED:

Dated this 30th day of August 2023.

KIND LAW FIRM

By: /s/ Kate M. Baxter-Kauf
 Michael Kind, SBN 13903
 Email: mk@kindlaw.com
 8860 S. Maryland Parkway, Suite 106
 Las Vegas, NV 89123
 Tel: 702.337.2322

CASEY GERRY SCHENK FRANCAVILLA

BLATT & PENFIELD, LLP
 Gayle M. Blatt (CA #122048)
(pro hac vice admitted)
 Email: gmb@cglaw.com
 110 Laurel Street
 San Diego, CA 92101
 Tel: 619.238.1811
 Fax: 619.544.9232

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

Kate M. Baxter-Kauf* (MN #0392037)
(pro hac vice admitted)
 Email: kmbaxter-kauf@locklaw.com
 Karen Hanson Riebel (MN #0219770)
(pro hac vice admitted)
 Maureen Kane Berg (MN #033344X)
(pro hac vice admitted)
 Email: mkberg@locklaw.com
 100 Washington Avenue St., Ste. 2200
 Minneapolis, MN 55401
 Tel: 612.339.6900
 Fax: 612.339.0981

Attorney for Plaintiff Stallone and the Class

LEWIS ROCA ROTHBERGER CHRISTIE LLP

By: /s/ Jennifer K. Hostetler
 Jennifer K. Hostetler, SBN 11994
 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, NV 89169-5996
 Tel: 702.474.2687

DLA PIPER LLP (US)

Isabelle Ord, (CA #198224)
(pro hac vice admitted)
 Email: Isabelle.ord@us.dlapiper.com
 Andrew Serwin (CA #179493)
(pro hac vice admitted)
 Email: andrw.serwin@us.dlapiper.com
 Jeffrey DeGroot, WSB #46839
(pro hac vice admitted)
 Email: Jeffrey.degroot@us.dlapiper.com
 555 Mission Street
 San Francisco, CA 94105-2933
 Tel: 415.836.2500
 Fax: 415.836.5201

Attorneys for Defendants

Farmers Group Inc., Farmers Insurance Exchange, and 21st Century Insurance Company

IT IS ORDERED.



United States ~~District~~ Judge
 Magistrate

9-14-2023

DATED: _____